REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. This application has been carefully reviewed in light of the Official Action mailed on December 19, 2008. Applicant has amended Claims 37, 55 and 89 and cancelled Claims 43, 46-54, 62-88 and 96-105. Applicant respectfully submits that no new matter has been added. Thus, Claims 37, 39-42, 44, 45, 55-61 and 89-95 remain pending.

This Reply encompasses a bona fide attempt to fully respond to the Examiner's rejections, including amendments as well as reasons why Applicant believes that embodiments of the invention as claimed are patentable over the applied prior art. Applicant respectfully requests reconsideration and favorable action in this case.

Rejections under 35 U.S.C. § 103

Claims 37 and 39-105 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0046262 ("Heilig") in view of U.S. Patent No. 6,654,814 ("Britton") and further in view of U.S. Patent No. 5,870,734 ("Kao").

Claim 37, as amended, recites the limitation:

> pass the first filesystem request to a server as a proxy request according to the server-facing filesystem interface, wherein passing the first filesystem request as a proxy request comprises applying a set of rules to the first filesystem request to determine if the first filesystem request should be modified and if it is determined that the first filesystem request should be modified, modifying the first filesystem request to generate the proxy request, wherein applying the set of rules to the first filesystem request comprises:
>
> determining from the filesystem request a corresponding requested operation and a filesystem object on which the requested operation is to be performed, where each of the set of rules comprises a pattern and an action, the pattern defining an expression for the evaluation of a set of metadata and an action defining how a file system request is to be modified, and
> evaluating each of the patterns for each of the set of rules utilizing metadata corresponding to the filesystem object, at least a portion of the set of metadata comprising metadata related to, or determined from, the first filesystem object.

Claims 55 and 89 recites similar limitations.

Thus, embodiments of the present invention may apply a set of rules to a filesystem request to determine if a filesystem request should be modified. These rules may be comprised of a pattern and a corresponding action where the pattern is an expression for the evaluation of metadata such that if the expression evaluates in a certain manner the corresponding action will be performed.

The filesystem request may request an operation be performed on a specific filesystem object. Additionally, a set of metadata which is related to, or determined from, the specific filesystem object may have been obtained. Accordingly, for that filesystem request each of the set of rules may be applied, where applying a rule for that filesystem request entails evaluating the expression of the pattern corresponding to the rule using the metadata corresponding to the filesystem object associated with that filesystem request. Using the results of the evaluation it can be determined if the action corresponding to the rule should be performed. In some instances, this action may entail the modification of the filesystem request.

In the Office Action the Examiner cites portions of the Britton reference for disclosures pertaining to the limitation which recites

> "pass[ing] the first filesystem request to a server as a proxy request according to the server-facing filesystem interface, wherein passing the first filesystem request as a proxy request comprises applying a set of rules to the first filesystem request to determine if the first filesystem request should be modified and if it is determined that the first filesystem request should be modified, modifying the first filesystem request to generate the proxy request"

Specifically, the Examiner cites Col. 11, lines 1-32 of Britton which recites:

> As seen in FIG. 3, when the browser 52 transmits a request, the client-side proxy 54 receives the request and determines if it is the first request for the current session (block 100). If the request is the first request, then it is determined if the client data processing system is capable of and has a preference for performing the content transformation or "tailoring" (i.e. should content tailoring occur at the client data processing system 50 or at another data processing system) (block 102). This information, along with other information about the client data processing system 50 and the session, such as for example, data processing capability, available memory, display type and size, resource availability, connection type, priorities for requested information, connection duration, or the like, is incorporated into the request (block 104). Client preferences and other session information (blocks 102 and 104) may reside at the client data processing system 50 or they may be obtained from a server during device initialization, at user logon or with each session. A user identification, such as a userid, may also be included in the request (block 106). The information added or otherwise contained in the request may collectively be referred to as "session specific information." After incorporating the session specific information in the request, the request is sent to the server-side proxy 64 (block 108).

> Returning to block 100 of FIG. 3, if the request from the browser 52 is not the first request, then, if the server side stores the previously transmitted session specific information, the only information which would need to be inserted into the request is the user identification and a session identifier to indicate that the previously transmitted session specific information remains valid (block 106). The request with the inserted user identification would then be sent to the server-side proxy (block 108). However, if the server-side proxy 64 does not store information, the session specific information may be added to and sent with each request.

As can be seen from a review of the above, Britton uses "session-specific information" to determine if a browser request should be modified to include a user identification or session identifier. Thus, Applicant respectfully submits that Britton does not disclose the use of rules to determine whether actions should be taken with respect to filesystem requests. Along the same lines, Britton does not disclose rules comprising patterns and actions where the patterns comprise expressions to be evaluated an expression for the evaluation of metadata such that if the expression evaluates in a certain manner the corresponding action will be performed. Thus, Britton does not apply a set of rules to evaluate a filesystem request by evaluating the expression of the pattern corresponding to the rule using the metadata corresponding to the filesystem object associated with that filesystem request.

Additionally, Applicant respectfully submits that the Heilig and Kao references do not remedy the deficiencies of the Britton reference. Consequently, Applicant believes that the Heilig, Britton and Kao references either alone or in combination do not disclose at least the limitation of Claims 37, 55 and 89 which recites

pass the first filesystem request to a server as a proxy request according to the server-facing filesystem interface, wherein passing the first filesystem request as a proxy request comprises applying a set of rules to the first filesystem request to determine if the first filesystem request should be modified and if it is determined that the first filesystem request should be modified, modifying the first filesystem request to generate the proxy request, wherein applying the set of rules to the first filesystem request comprises:

determining from the filesystem request a corresponding requested operation and a filesystem object on which the requested operation is to be performed, where each of the set of rules comprises a pattern and an action, the pattern defining an expression for the evaluation of a set of metadata and an action defining how a file system request is to be modified, and

evaluating each of the patterns for each of the set of rules utilizing metadata corresponding to the filesystem object, at least a portion of the set of metadata comprising metadata related to, or determined from, the first filesystem object.

Accordingly, withdrawal of the rejection of Claims 37, 55 and 89 and their respective pending dependent Claims 39-42, 44, 45, 56-61 and 90-95 is respectfully requested.

CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include any acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 37, 39-42, 44, 45, 55-61 and 89-95. The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

An extension of one (1) month is requested and a Notification of Extension of Time Under 37 C.F.R. § 1.136 with the appropriate fee is enclosed herewith.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

Sprinkle IP Law Group
Attorneys for Applicant

Ari G. Akmal
Reg. No. 51,388

Date: April 2, 2009
1301 W. 25th Street, Suite 408
Austin, TX 78705
Tel. (512) 637-9220
Fax. (512) 371-9088